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May 25, 2023

BY ECF

Honorable Jennifer E. Willis United States Magistrate Judge Southern District of New York 500 Pearl Street New York, New York 10007

Re: Hassab El Nabi v. Tocco, et al., 21 CV 3768 (LAK) (JW)

Your Honor:

I am plaintiff's former counsel. In accordance with the order dated May 9, 2023 and with the consent of substitute counsel, I write to respectfully request leave to file the undersigned's declaration and supporting exhibits under seal. If it should please the Court, the exhibits contain confidential attorney-client communications and work-product that should not be publicly filed.

Thank you for your consideration of this request.

Respectfully submitted,

Gabriel P. Harvis

cc: All Counsel